

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)	
)	
)	
v.)	No. 1:23-mj-00012-PAS
)	
MICHAEL BRIER,)	
Defendant)	

MOTION FOR LEAVE TO TRAVEL

Now come the defendant, Michael Brier ("Mr. Brier") and moves this Honorable Court for Leave to Travel as follows:

1. On March 2, 2023, upon the filing of a criminal complaint on February 28, 2023, charging Mr. Brier with healthcare fraud, aggravated identity theft, money laundering and falsification of records in a government investigation, this Court ordered Mr. Brier released on certain conditions (Conditions of Release)(Docket 11 [03/02/23]). Two of the Conditions of Release are Stand Alone Monitoring [Condition 7(p)(iv) Document 11 at Page ID #164] with GPS monitoring [Condition 7(q)(iv) Document 11 at Page ID #165] and a travel restriction to the Districts of Massachusetts (where Mr. Brier currently resides) and Rhode Island (where the case is pending and his counsel is located)[Condition 7(f) Document 11 at Page ID #164].

2. Since his release, Mr. Brier currently is and has consistently been in compliance with all conditions of his release.

3. As the Court is aware, Mr. Brier has a daughter, Karen Brier, who resides in Los Angeles, California and that on March 1, 2023 (the day before these conditions were

imposed, while Mr. Brier was still in custody), Karen gave birth to Ana Brier Skoff, Mr. Brier's granddaughter, currently a little over 10 months old.

4. With the assent of the Government, the Court has previously allowed Mr. Brier to travel to California to visit his daughter and granddaughter (see Text Order dated August 3, 2023 granting Motion for Leave to Travel, Document 21; and Text Order dated December 19, 2023 granting Motion for Leave to Travel, Document 26).

5. Mr. Brier wishes to travel to California to visit with his daughter and new granddaughter. His plan is to travel from Boston to Los Angeles on Wednesday, April 17, 2024, and to return from Los Angeles to Boston on Friday, April 26, 2024. While in Los Angeles Mr. Brier will stay with his daughter at her residence. Counsel and Mr. Brier are in possession of the details of the travel itinerary and the location and contact information for Mr. Brier's daughter in California and will provide the same to Probation and to the Government upon the filing of this motion.

6. Defense Counsel and the Government have conferred concerning this matter and defense counsel has been authorized to inform the Court that the Government assents to the within motion, provided that the defendant coordinates all of his travel arrangements with Probation and remains on the GPS monitoring.

WHEREFORE, the defendant respectfully moves that this Honorable Court allow him to travel to Los Angeles California between April 17 and April 26, 2024 for the purpose of visiting his daughter and granddaughter.

Respectfully submitted,
Michael Brier,
By His Attorney,
/s/ Anthony M. Traini
Anthony M. Traini (#4793)
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CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2024, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Anthony M. Traini